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April 16, 2024

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Court for the Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

**Re: Case No. 23-cv-08510 (PAE), *Qiana Martin, on behalf of herself and all others similarly situated v. Bottom Line Concepts, LLC***

Dear Judge Engelmayer:

We are co-counsel to Defendant Bottom Line Concepts, LLC ("BLC") in the above-captioned proceeding and write jointly, with counsel for Plaintiffs, to request an extension of time to respond to Plaintiff Qiana Martin's ("Plaintiff") second amended complaint (the "SAC") and an adjournment of the initial pretrial conference.

The parties previously requested an extension of the deadline for BLC to respond to Plaintiff's SAC to April 18, 2024, and an adjournment of the initial pretrial conference. The Court granted the request and rescheduled the pretrial conference to May 3, 2024. [ECF No. 38]

We respectfully request that the Court extend the deadline for BLC to respond to Plaintiff's SAC to May 14, 2024, and the initial pretrial conference be adjourned to May 28th, May 29th, May 30th, or May 31st, depending on the Court's availability.

Good cause supports the requested extension. The undersigned and lead counsel have had several unexpected deadlines and need additional time to research and respond to the 28-page, 134-paragraph Complaint. Moreover, the Parties request additional time to confer regarding a Rule 26 report and engage in further discussions.

Plaintiff's counsel has consented to the request for an extension and adjournment.

We appreciate the Court's attention to this matter.

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Respectfully,

*Nader Mobargha*

Nader Mobargha, Esq.

*Co-counsel for Defendant Bottom Line Concepts, LLC*

cc: All counsel via ECF

GRANTED. The Court is unavailable due to a trial on the dates provided by counsel. The Court thus reschedules the pretrial conference in this case to **June 3, 2024 at 10 a.m.** Preconference materials are due two days before. No further extensions will be granted.

SO ORDERED.

Dated: April 16, 2024  
New York, New York

*Paul A. Engelmayer*

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PAUL A. ENGELMAYER  
United States District Judge